

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

---

Scott A. Lemieux,

Civ. No. 0:16-cv-01794 (JRT-HB)

Plaintiff,

v.

**DECLARATION OF  
MARK REDD**

Soo Line Railroad Company d/b/a  
Canadian Pacific Railway,

Defendant.

---

1. I am currently the Senior Vice-President of Operations West Region located in Calgary, Canada.

2. Mr. Johnson currently serves as Executive Vice President, Operations, which he has held since April 2016. In this position, Mr. Johnson has overall operational responsibility for CP's rail network, including aspects of operational safety, service, engineering and mechanical services in both Canada and the United States. He reports directly to the President and Chief Executive Officer. He resides and works in Calgary, Canada. At the time of the events underlying the allegations in Plaintiff's Complaint, Mr. Johnson held the position of Vice President, Operations for the Southern Region.

3. I am currently Senior Vice President Operations, West Region. I was appointed to this position in 2017. I reside and work in Calgary Canada. I report directly to Mr. Johnson. At the time of the events relating to Plaintiff's Complaint, I held the position of General Manager, Operations, US West.

4. In my capacity as General Manager, Operations, US West at the time, I was the decisionmaker for the discipline decisions assessed to Mr. Lemieux at issue in this case: a 5-day suspension issued March 6, 2015; and his employment termination on April 13, 2015.

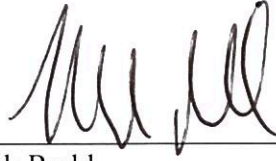
5. Attached at Tab A is a copy of an email exchange dated March 6, 2015.

6. Attached at Tab B is a copy of an email I prepared and sent to Mr. Johnson on March 4, 2015.

7. Attached at Tab C is a copy of an email I prepared and sent to Mr. Johnson on April 13, 2015.

***[Signature Page to Follow]***

I declare under penalty of perjury that everything I have stated in this document is true and correct.

A handwritten signature in black ink, appearing to read 'Mark Redd', written over a horizontal line.

Mark Redd

Dated: Dec. 15, 2017